

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

US TAX RECOVERY PARTNERS,)
LLC,)
)
 Plaintiff,)
)
v.) CIVIL ACTION NO. SA-19-CV-938-XR
)
)
SOUTHERN BAKERIES, LLC,)
)
)
 Defendant.)

DEFENDANT'S MOTION TO DISMISS AND PETITION FOR ATTORNEYS' FEES

Defendant, Southern Bakeries, LLC, by counsel and pursuant to the federal doctrine of *forum non conveniens*, hereby moves this Court to dismiss all counts against it in Plaintiff's First Amended Complaint filed by US Tax Recovery Partners, LLC and, pursuant to Rule 41(d)(1) of the Federal Rules of Civil Procedure, petitions this Court to award attorneys' fees to Defendant. In support thereof, Southern Bakeries, LLC is filing a memorandum concurrently with this motion.

Respectfully submitted,

/s/ Richard L. Ellison
SBOT #: 06580700
ATTORNEY FOR DEFENDANT
SOUTHERN BAKERIES, LLC

Richard L. Ellison, P.C.
500 Main St. Suite J
Kerrville, Texas 78028
Tel. 830-792-5601
Fax. 830-792-5602
rellison@richardellisonlaw.com

CERTIFICATE OF SERVICE

I certify that on October 15, 2019 I filed this document with the District Clerk via the ECF system, and the Clerk will electronically forward it to opposing counsel:

Tiffanie S. Clauswitz
Rosenblatt Law Firm
17731 Huebner Rd. 78248
Tel. 210-562-2900
Fax. 210-562-2920

/s/ Richard L. Ellison